

\_Verified Correct Copy of Original 5/20/2024.\_

**IN THE WASHINGTON COUNTY CIVIL COURT**

**Jefferson Hamilton**  
**Plaintiff,**

vs.

**24CV24722**

**Tigard Police Department**  
**Defendant.**

**CASE NO.:**

**COMPLAINT FOR DISCRIMINATION, DEFAMATION, AND INTENTIONAL INFLICTION OF  
EMOTIONAL DISTRESS**

**COMPLAINT:**

**PRAYER FOR RELIEF: \$1,000,000**

**SUBJECT TO ARBITRATION: No**

**ORS § 14.080– Washington County Circuit Court**

**PARTIES**

1. Plaintiff, Jefferson Hamilton, is a resident of Vancouver, Washington at 2703 NE 99th St, Vancouver, WA 98665.
2. Defendant, Tigard Police Department, is a law enforcement agency located at 13125 SW Hall Blvd, Tigard, OR 97223 in Washington County, Oregon.

**JURISDICTION AND VENUE**

This Court has jurisdiction over the subject matter of this action pursuant to the laws of the State of Oregon and the Oregon Rules of Civil Procedure.

**NATURE OF ACTION**

1. Plaintiff brings this action against the Defendant, Tigard Police Department, for discrimination, defamation, and intentional infliction of emotional distress.

**FACTS**

1. Plaintiff, while going about regular activities, has been subjected to discriminatory treatment and intimidation by officers of the Defendant police department.
2. Despite Plaintiff's compliance with all lawful orders and regulations, officers subjected Plaintiff to unjustified scrutiny and intimidation solely based on Plaintiff's race.
3. Additionally, on several occasions, Plaintiff was followed by officers of the Defendant police department as Plaintiff was leaving Starbucks in Tigard, Oregon. The officers' conduct implied anticipation of criminal activity and imminent arrest, despite no lawful grounds for such action, damaging Plaintiff's reputation.

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4. On another occasion, a police officer employed by the Defendant police department parked a patrol car conspicuously close to Plaintiff's place of work, arriving around the time Plaintiff was scheduled to finish work. This action created an intimidating atmosphere and implied suspicion of Plaintiff's activities without justification.
5. The actions of the Defendant police department, including following Plaintiff outside Starbucks and parking a patrol car near Plaintiff's workplace, were intimidating and implied Plaintiff's guilt without cause, causing further emotional distress.
6. The officers' conduct exhibited a pattern of harassment and discrimination based on Plaintiff's race, constituting a violation of Plaintiff's civil rights and causing severe emotional distress.

### **CLAIMS FOR RELIEF**

#### **Count I: Discrimination**

1. Plaintiff realleges and incorporates by reference all preceding paragraphs.
2. Defendant's discriminatory treatment towards Plaintiff constitutes a violation of Plaintiff's rights under state and federal anti-discrimination laws.

#### **Count II: Defamation**

1. Plaintiff realleges and incorporates by reference all preceding paragraphs.
2. Defendant's actions of following Plaintiff to Starbucks and parking cars outside Starbucks in a manner suggesting imminent arrest implied to a reasonable person that Plaintiff was a criminal, damaging Plaintiff's reputation.
3. These actions were undertaken without lawful grounds and without regard for Plaintiff's rights, causing harm to Plaintiff's standing in the community and inflicting emotional distress.

#### **Count III: Intentional Infliction of Emotional Distress**

1. Plaintiff realleges and incorporates by reference all preceding paragraphs.
2. Defendant's extreme and outrageous conduct, including discriminatory treatment and surveillance, intentionally inflicted severe emotional distress upon Plaintiff.

### **PRAYER FOR RELIEF**

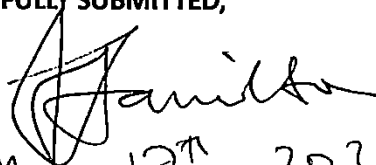
WHEREFORE, Plaintiff respectfully requests that this Court grant the following relief:

1. Compensatory damages in the amount of \$1,000,000, to be determined at trial for the discrimination, defamation, and intentional infliction of emotional distress suffered by Plaintiff.
2. Punitive damages in an amount to be determined at trial.
3. Reasonable attorney's fees and costs pursuant to applicable law.
4. Such other and further relief as the Court deems just and proper.

### **JURY DEMAND**

Plaintiff demands a trial by jury on all issues so triable.

**RESPECTFULLY SUBMITTED,**

  
May 17<sup>th</sup>, 2024

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Jefferson Hamilton  
2703 NE 99th St  
Vancouver, WA 98665  
May 17<sup>th</sup>, 2024.